

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION

FEDERAL TRADE COMMISSION,  
STATE OF CALIFORNIA, STATE OF  
COLORADO, STATE OF ILLINOIS,  
STATE OF INDIANA, STATE OF IOWA,  
STATE OF MINNESOTA, STATE OF  
NEBRASKA, STATE OF OREGON,  
STATE OF TENNESSEE, STATE OF  
TEXAS, STATE OF WASHINGTON, and  
STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,  
SYNGENTA CORPORATION,  
SYNGENTA CROP PROTECTION, LLC,  
and CORTEVA, INC.,

Defendants.

Case No. 1:22-cv-00828-TDS-JEP

**DECLARATION OF ALLYSON M.  
MALTAS IN SUPPORT OF  
PLAINTIFFS' MOTION TO  
COMPEL DISCOVERY OF  
CORTEVA, INC.**

**[TEMPORARY PUBLIC  
REDACTED VERSION]**

I, Allyson M. Maltas, do hereby declare and state as follows:

1. I am an active member in good standing of the bar of the District of Columbia. I am a Senior Trial Counsel in the Bureau of Competition of the Federal Trade Commission (“FTC”), an agency of the United States Government, and I am representing the FTC in the above-captioned action. I have personal knowledge of the matters set forth in this Declaration.

2. I respectfully submit this Declaration in support of Plaintiffs’ Motion To Compel Discovery of Defendant Corteva, Inc.

3. Attached as Exhibit A is a true and correct copy of Plaintiffs' First Set of Requests For Production to Corteva, Inc., served on April 19, 2024.

4. Attached as Exhibit B is a true and correct copy of Defendant Corteva's Responses and Objections to Plaintiffs' First Set of Requests For Production of Documents, served on May 20, 2024.

5. Attached as Exhibit C is a true and correct copy of the July 8, 2024 email from Maximilian Auerbach to Wesley Carson regarding Plaintiffs' First Set of Requests For Production.

6. Attached as Exhibit D are true and correct excerpts from Corteva's economic white paper titled [REDACTED] submitted by Corteva during the pre-complaint investigation on April 1, 2022.

7. Attached as Exhibit E are true and correct excerpts from the December 8, 2010 Dow AgroSciences presentation titled, [REDACTED]  
[REDACTED] produced to Plaintiffs by Corteva during the pre-complaint investigation as FTC-CTVA\_00001306.

8. Attached as Exhibit F is a true and correct copy of the June 18, 2024 letter from Maximilian Auerbach to Wesley Carson regarding Plaintiffs' First Set of Requests For Production.

9. Attached as Exhibit G are true and correct excerpts from the August 17, 2017 Dow-DuPont document titled [REDACTED]

████████ produced to Plaintiffs by Corteva during the pre-complaint investigation as  
FTC-CTVA\_00975810.

10. Attached as Exhibit H is a true and correct copy of the September 2014  
████████

████████ produced to Plaintiffs by Corteva during the pre-  
complaint investigation as CTVA-FTC-00002078.

11. Attached as Exhibit I are true and correct excerpts from the January 17,  
2014 DuPont presentation titled, ██████████ ██████████ produced to Plaintiffs  
by Corteva during the pre-complaint investigation as FTC-CTVA\_00371800.

12. Attached as Exhibit J is a true and correct copy of the June 10, 2024 letter  
from Wesley Carson to Ben Bauer regarding Plaintiffs' First Set of Requests For  
Production.

13. Attached as Exhibit K is a true and correct copy of the June 21, 2024 letter  
from Wesley Carson to Ben Bauer and Maximilian Auerbach regarding Plaintiffs' First  
Set of Requests For Production.

Executed on July 12, 2024.

/s/ Allyson M. Maltas

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